

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

**JANE DOE,**

**Plaintiff,**

**v.**

**RECTOR AND VISITORS OF THE  
UNIVERSITY OF VIRGINIA,**

**Defendant.**

**Case No. 3:23-cv-00018-RSB**

**DEFENDANT'S MOTION TO SEAL**

Defendant the Rector and Visitors of the University of Virginia, through counsel, moves this Court to permit it to file certain exhibits to its Memorandum in Support of Motion for Summary Judgment (ECF No. 67) and Memorandum in Support of Motion to Exclude Plaintiff's Expert Andrew C. Verzilli (ECF No. 69) under seal pursuant to Local Rule 9. Defendant seeks to file records relating to the Title IX investigation that is the subject of this lawsuit, Plaintiff's discovery responses, and other discovery materials under seal. This Court should permit sealing of these exhibits because they contain highly sensitive information relating to sexual assault and sexual harassment, and which are also subject to regulations under the Family Educational Rights and Privacy Act ("FERPA"). Also, these records could be used to determine the true identity of Plaintiff who is proceeding under a pseudonym. Plaintiff supports the granting of this motion.

For these reasons, and as explained in more detail in Defendant's Memorandum in Support filed contemporaneously with this Motion, Defendant move this Court under Local Rule 9 to enter an Order permitting Defendant to file under seal certain exhibits in support of its Memorandum in Support of Motion for Summary Judgment and Memorandum in Support of Motion to Exclude Plaintiff's Expert Andrew C. Verzilli.

Respectfully submitted,

**THE RECTOR AND VISTORS OF THE  
UNIVERSITY OF VIRGINIA**

By Counsel: /s/ Christopher P. Bernhardt

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**CERTIFICATE**

I hereby certify that on September 25, 2024, I electronically filed the foregoing with the  
Clerk of the Court using the CM/ECF system.

/s/ Christopher P. Bernhardt

Christopher P. Bernhardt\* (VSB No. 80133)

Assistant Attorney General